



GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted Via Overnight Courier

July 6, 2011

Mr. Dean Tagliaferro
United States Environmental Protection Agency
c/o Weston Solutions
10 Lyman Street
Pittsfield, MA 01201

**Re: GE Pittsfield/Housatonic River Site
East Street Area 2-North (GECN 140)
Soil Removal/Backfilling During Pavement Installation Activities**

Dear Mr. Tagliaferro:

The General Electric Company (GE) has previously advised the U.S. Environmental Protection Agency (EPA) that, during the course of developing a Grant of Environmental Restriction and Easement (ERE) for East Street Area 2-North, GE determined that it would be appropriate to pave certain areas in this Removal Action Area (RAA) that are currently unpaved, so that those areas would become part of the Other Ground-Covering Feature Area under the ERE. GE is preparing to conduct these paving activities in the near future in conjunction with other planned paving activities.¹ In order to properly complete the paving of these currently unpaved areas, GE anticipates that, in certain of those areas, approximately 6 inches of existing surface soils will be removed in order to allow for placement of a suitable subbase layer. Accordingly, GE has prepared this letter to notify EPA of (a) the planned approach for the management and disposition of such soils; (b) relevant information pertaining to backfilling the areas to be paved (as well as placement of topsoil in a nearby unpaved area); and (c) the approximate locations of the ambient air monitoring stations to be utilized during these soil removal and backfilling activities.

A. MANAGEMENT AND DISPOSITION OF SOILS

As described above, GE will remove approximately 6 inches of existing surface soils in certain areas that are to be converted from unpaved to paved, so as to facilitate the placement of a suitable subbase layer in those areas. The anticipated soil removal areas are identified on Figure 1.² GE has reviewed the available surface soil data from prior sample locations in the vicinity of the soil removal areas (as also shown on Figure 1) to determine potential disposition options for the excavated materials. The available data set from these surface soil samples includes analytical results for polychlorinated biphenyls (PCBs) and for the hazardous constituents listed in

¹ Those other paving activities include: (a) the installation of a minimum of 3 inches of asphalt over the slabs of former Buildings 3B and 7 in accordance with GE's March 2011 *Updated Proposal for Remaining Concrete Floor Slabs in and Adjacent to the 19s Complex* (approved by EPA on April 22, 2011); and (b) the repair of several existing paved locations identified with holes or other damage during the May 2011 post-remediation inspection, as described in GE's June 29, 2011 letter report on that inspection. Those activities will not involve any soil removal and are not the subject of this letter.

² Note that soil removal may be more limited or potentially unnecessary in the areas surrounding the elevated concrete pads west of Building 100B and east of Building 100A (where the removal will likely be limited to removal of loose stone and vegetation). Additionally, soil removal will not be necessary in the unpaved areas around Building 9D where paving will be performed; instead, loose stone and vegetation will be removed from those areas prior to paving. Hence, those areas around Building 9D are not identified on Figure 1.

Appendix IX of 40 CFR Part 264 (excluding pesticides and herbicides), plus three additional constituents – benzidine, 2-chloroethyl vinyl ether, and 1,2-diphenylhydrazine (Appendix IX+3). These results are summarized in Tables 1 and 2, respectively. Based on a review of the existing PCB data from these samples, none of the excavated materials will be subject to disposal regulations under the Toxic Substances Control Act. Further, based on review of the non-PCB data and application of the screening procedure described in Section 3.2 of GE's *Waste Characterization Plan* (Attachment A to the *Project Operations Plan* [POP; March 2007]), none of these materials will constitute hazardous waste under the Resource Conservation and Recovery Act.

Based on these data, GE will transport excavated materials to a designated staging area near the Building 9 and 10 area where the materials will be temporarily stockpiled prior to off-site transportation to an appropriate disposal facility. Although these activities are not response actions under the Consent Decree (CD) for the GE-Pittsfield/Housatonic River Site, the excavations, temporary stockpiles, and security procedures will meet the requirements specified for such measures in Section 3.4.2 of GE's *Site Management Plan* (Attachment C to the POP).

B. BACKFILLING AND TOPSOIL PLACEMENT

Gravel subbase materials will be used to backfill the soil removal areas, as necessary, in order to provide a suitable subbase layer prior to placing asphalt pavement. In addition, topsoil will be placed within the unpaved area between the former Building 7 slab and the existing retaining wall adjacent to Tyler Street. It is anticipated that these backfill materials and topsoil will be obtained from Pittsfield Sand & Gravel, which has previously been used for other GE remediation projects in Pittsfield. In anticipation of such use, representative samples of the proposed fill materials were collected on June 28, 2011 and submitted for laboratory analysis of PCBs and certain other Appendix IX+3 constituents, consistent with the provisions in Section 2.2 of GE's *Soil Cover/Backfill Characterization Plan* (Attachment B to the POP). The results of this sampling will be documented in the CD Monthly Status Report for the month in which those results are received. If the analytical results of such sampling indicate that the proposed fill material(s) are unsuitable for use (based on the criteria specified in Section 3.2 of the *Soil Cover/Backfill Characterization Plan*), GE will notify EPA of its proposed follow-up measures (i.e., re-sampling and/or sampling of an alternative fill source).

C. AMBIENT AIR MONITORING STATION LOCATIONS

Ambient air monitoring for particulate matter will be performed during soil removal and backfilling activities. The approximate locations of the particulate ambient air monitoring stations to be used during these upcoming soil removal and backfilling activities are shown on Figure 2 (along with the soil removal areas). The monitoring stations that will be operated on a given day will be based on the location of the soil removal/backfilling activities on that day.

Please feel free to contact me with questions or comments.

Sincerely,



Richard W. Gates
Remediation Project Manager

Attachments

cc: J. Kilborn, EPA*
H. Inglis, EPA
R. Howell, EPA*
J. Ziegler, MDEP (2 copies)
M. Gorski, MDEP*
E. Tor, MDEP*
L. Palmieri, Weston (2 copies)
Mayor J. Ruberto, City of Pittsfield
C. Thurston, Executive Director, PEDDA
B. Landau, Noble & Wickersham
J. Gagnon, O'Reilly, Talbot & Okun
M. Carroll, GE*
R. McLaren, GE*
J. Bieke, Goodwin Procter
J. Nuss, ARCADIS
M. Hassett, ARCADIS
M. Hawkins, BEC
GE Internal Repositories
Public Information Repositories

(* without attachments)

**TABLE 1
PCB SOIL SAMPLING DATA**

**EAST STREET AREA 2 - NORTH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in dry weight parts per million, ppm)**

Location ID	Depth (Feet)	Date Collected	Aroclor-1016	Aroclor-1221	Aroclor-1232	Aroclor-1242	Aroclor-1248	Aroclor-1254	Aroclor-1260	Total PCBs
95-14	0-2	3/4/1996	ND(0.037)	ND(0.075)	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	36	36
95-18	0-2	2/21/1996	ND(0.20)	ND(0.41)	ND(0.20)	ND(0.20)	ND(0.20)	ND(0.20)	1.8	1.8
RAA5-B2	0-1	2/26/2004	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.066	0.067	0.133
RAA5-B3	0-1	3/2/2004	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)
RAA5-C2	0-1	2/25/2004	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	0.80	0.80	1.6
RAA5-C3	0-1	2/22/2006	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.12	0.14	0.26
RAA5-C10	0-1	3/4/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)
RAA5-D3	0-1	1/9/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.50	0.62	1.12
RAA5-D9	0-1	3/1/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.60	0.60
RAA5-E2	0-1	2/26/2004	ND(0.17)	ND(0.17)	ND(0.17)	ND(0.17)	ND(0.17)	1.4	2.2	3.6
RAA5-E4	0-1	2/16/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.056	0.056
RAA5-E10	0-1	3/12/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.52	0.96	1.48
RAA5-E12	0-1	3/2/2004	ND(0.18)	ND(0.18)	ND(0.18)	ND(0.18)	ND(0.18)	3.1	1.3	4.4
RAA5-F2	0-1	2/26/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.47	0.34	0.81
RAA5-G2	0-1	2/26/2004	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.12	0.23	0.35
RAA5-G3	0-1	2/16/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.015 J	ND(0.035)	0.015 J
RAA5-I17	0-1	3/2/2004	ND(0.18)	ND(0.18)	ND(0.18)	ND(0.18)	ND(0.18)	5.2	7.4	12.6
RAA5-J16	0-1	1/27/2004	ND(0.74)	ND(0.74)	ND(0.74)	ND(0.74)	ND(0.74)	4.3	6.6	10.9
RAA5-J18	0-1	1/27/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.13	0.29	0.42
RAA5-J19	0-1	12/8/2004	ND(1.9)	ND(1.9)	ND(1.9)	ND(1.9)	ND(1.9)	16	25	41
RAA5-J21	0-1	3/2/2004	ND(18)	ND(18)	ND(18)	ND(18)	ND(18)	ND(18)	26	26
RAA5-JK20	0-1	12/8/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.25	0.45	0.70
RAA5-K13	0-1	6/8/2004	ND(0.74)	ND(0.74)	ND(0.74)	ND(0.74)	ND(0.74)	ND(0.74)	10	10
RAA5-K18	0-1	12/8/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.15	0.53	0.68

- Notes:**
1. Samples were collected by ARCADIS and were submitted to CompuChem Environmental Corporation and SGS Environmental Services, Inc. for analysis of PCBs.
 2. Samples have been validated as per GE's EPA-approved FSP, General Electric Company, Pittsfield, Massachusetts, ARCADIS.
 3. ND - Analyte was not detected. The number in parentheses is the associated detection limit.

Data Qualifiers:
J - Indicates that the associated numerical value is an estimated concentration.

**TABLE 2
APPENDIX IX+3 SOIL SAMPLING DATA**

**EAST STREET AREA 2 - NORTH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in dry weight parts per million, ppm)**

Parameter	Sample ID: Sample Depth(Feet): Date Collected:	TCLP 20 Times Rule	RAA5-C2 0-1 02/25/04	RAA5-E2 0-1 02/26/04	RAA5-E12 0-1 03/02/04	RAA5-G3 0-1 02/16/04
Volatile Organics						
None Detected		--	--	--	--	--
Semivolatile Organics						
2-Methylnaphthalene		--	ND(0.42)	ND(0.35)	ND(0.36)	ND(0.35)
Acenaphthene		--	ND(0.42)	ND(0.35)	ND(0.36)	ND(0.35)
Acenaphthylene		--	ND(0.42)	ND(0.35)	ND(0.36)	ND(0.35)
Anthracene		--	ND(0.42)	ND(0.35)	ND(0.36)	ND(0.35)
Benzo(a)anthracene		--	0.39 J	ND(0.35)	ND(0.36)	ND(0.35)
Benzo(a)pyrene		--	0.34 J	ND(0.35)	ND(0.36)	ND(0.35)
Benzo(b)fluoranthene		--	0.28 J	ND(0.35)	ND(0.36)	ND(0.35)
Benzo(g,h,i)perylene		--	0.19 J	ND(0.35)	ND(0.36)	ND(0.35)
Benzo(k)fluoranthene		--	0.44	ND(0.35)	ND(0.36)	ND(0.35)
Chrysene		--	0.44	ND(0.35)	ND(0.36)	ND(0.35)
Dibenzo(a,h)anthracene		--	ND(0.42)	ND(0.35)	ND(0.36)	ND(0.35)
Dibenzofuran		--	ND(0.42)	ND(0.35)	ND(0.36)	ND(0.35)
Fluoranthene		--	0.67	ND(0.35)	ND(0.36)	ND(0.35)
Fluorene		--	ND(0.42)	ND(0.35)	ND(0.36)	ND(0.35)
Indeno(1,2,3-cd)pyrene		--	0.13 J	ND(0.35)	ND(0.36)	ND(0.35)
Naphthalene		--	ND(0.42)	ND(0.35)	ND(0.36)	ND(0.35)
Phenanthrene		--	0.11 J	ND(0.35)	ND(0.36)	ND(0.35)
Phenol		--	ND(0.42)	ND(0.35)	ND(0.36)	0.086 J
Pyrene		--	0.79	ND(0.35)	ND(0.36)	ND(0.35)
Furans						
2,3,7,8-TCDF		--	0.000012 Y	0.000015 Y	0.000014 Y	ND(0.0000030)
TCDFs (total)		--	0.0013 I	0.0013 I	0.010 I	ND(0.0000030)
1,2,3,7,8-PeCDF		--	0.0000085	ND(0.0000026)	0.000021	ND(0.0000032)
2,3,4,7,8-PeCDF		--	0.0000086	0.000035	0.000039	ND(0.0000033)
PeCDFs (total)		--	0.0027 I	0.0035 I	0.0079 I	ND(0.0000033)
1,2,3,4,7,8-HxCDF		--	0.0000085	0.000023	0.000015	ND(0.0000021)
1,2,3,6,7,8-HxCDF		--	ND(0.0000012)	0.0000035	0.0000060	ND(0.0000021)
1,2,3,7,8,9-HxCDF		--	0.0000022	0.0000015	ND(0.0000022)	ND(0.0000018)
2,3,4,6,7,8-HxCDF		--	0.000011	0.000010	0.000011	ND(0.0000018)
HxCDFs (total)		--	0.0015 I	0.0011 I	0.0040 I	ND(0.0000021)
1,2,3,4,6,7,8-HpCDF		--	0.000029	0.000018	0.000020	ND(0.0000014) X
1,2,3,4,7,8,9-HpCDF		--	0.0000034	ND(0.00000058)	0.0000070	ND(0.00000021)
HpCDFs (total)		--	0.000091 I	0.000052 I	0.000058 I	ND(0.0000021)
OCDF		--	0.000016	0.0000076	0.000013	ND(0.00000045)
Dioxins						
2,3,7,8-TCDD		--	ND(0.00000018)	ND(0.00000038)	ND(0.00000034)	ND(0.00000025)
TCDDs (total)		--	ND(0.00000018)	ND(0.00000038)	ND(0.00000034)	ND(0.00000025)
1,2,3,7,8-PeCDD		--	ND(0.0000024)	ND(0.0000059)	ND(0.0000054)	ND(0.00000072)
PeCDDs (total)		--	ND(0.0000024)	ND(0.0000059)	ND(0.0000054)	ND(0.00000072)
1,2,3,4,7,8-HxCDD		--	ND(0.00000069)	ND(0.0000014)	ND(0.0000010)	ND(0.00000025)
1,2,3,6,7,8-HxCDD		--	ND(0.00000069)	ND(0.0000014)	ND(0.00000098)	ND(0.00000023)
1,2,3,7,8,9-HxCDD		--	ND(0.00000063)	ND(0.0000013)	ND(0.00000089)	ND(0.00000021)
HxCDDs (total)		--	ND(0.00000069)	ND(0.0000014)	0.000016	ND(0.00000025)
1,2,3,4,6,7,8-HpCDD		--	0.000012	ND(0.00000039)	0.0000086	ND(0.00000025)
HpCDDs (total)		--	0.000028	ND(0.00000039)	0.000019	ND(0.00000025)
OCDD		--	0.000080	ND(0.00000022) X	0.000017	ND(0.0000032) X
Total TEQs (WHO TEFs)		--	0.000010	0.000026	0.000029	0.0000067
Inorganics						
Antimony		--	1.80 B	ND(6.00)	ND(6.00)	ND(6.00)
Arsenic	100		9.90	4.20	4.50	8.00
Barium	2,000		21.0	17.0 B	14.0 B	22.0
Beryllium	--		0.190 B	0.100 B	0.160 B	0.160 B
Cadmium	20		0.580	0.260 B	0.200 B	0.640
Chromium	100		5.50	5.30	6.00	11.0
Cobalt	--		6.70	13.0	31.0	41.0
Copper	--		36.0	23.0	30.0	34.0
Cyanide	--		0.220 B	ND(0.520)	0.0340 B	0.160 B
Lead	100		30.0	6.20	11.0	17.0
Mercury	4		0.0950 B	0.0240 B	0.840	ND(0.100)
Nickel	--		9.70	9.90	12.0	20.0
Selenium	20		ND(1.00) J	0.870 J	ND(1.00) J	1.50 J
Silver	100		ND(1.00)	0.320 B	ND(1.0)	0.320 B
Sulfide	--		26.0	12.0	8.60	13.0
Vanadium	--		5.60	4.40 B	3.80 B	8.10
Zinc	--		56.0	43.0	35.0	55.0

TABLE 2
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EAST STREET AREA 2 - NORTH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in dry weight parts per million, ppm)

Parameter	Sample ID: Sample Depth(Feet): Date Collected:	TCLP 20 Times Rule	RAA5-I17 0-1 03/02/04	RAA5-J16 0-1 01/27/04	RAA5-J18 0-1 01/27/04	RAA5-J21 0-1 03/02/04
Volatile Organics						
None Detected		--	--	--	--	--
Semivolatile Organics						
2-Methylnaphthalene		--	ND(0.37)	0.10 J	ND(0.38)	ND(0.37)
Acenaphthene		--	ND(0.37)	0.35 J	ND(0.38)	ND(0.37)
Acenaphthylene		--	ND(0.37)	0.12 J	ND(0.38)	ND(0.37)
Anthracene		--	ND(0.37)	0.75	ND(0.38)	ND(0.37)
Benzo(a)anthracene		--	0.097 J	1.1	ND(0.38)	ND(0.37)
Benzo(a)pyrene		--	ND(0.37)	0.54	ND(0.38)	ND(0.37)
Benzo(b)fluoranthene		--	0.083 J	0.49	ND(0.38)	0.047 J
Benzo(g,h,i)perylene		--	ND(0.37)	0.35 J	ND(0.38)	ND(0.37)
Benzo(k)fluoranthene		--	0.094 J	0.53	ND(0.38)	0.054 J
Chrysene		--	0.10 J	1.2	0.10 J	ND(0.37)
Dibenzo(a,h)anthracene		--	ND(0.37)	0.094 J	ND(0.38)	ND(0.37)
Dibenzofuran		--	ND(0.37)	0.33 J	ND(0.38)	ND(0.37)
Fluoranthene		--	0.21 J	3.6	0.22 J	0.15 J
Fluorene		--	ND(0.37)	0.39	ND(0.38)	ND(0.37)
Indeno(1,2,3-cd)pyrene		--	ND(0.37)	0.31 J	ND(0.38)	ND(0.37)
Naphthalene		--	ND(0.37)	0.18 J	ND(0.38)	ND(0.37)
Phenanthrene		--	0.099 J	4.0	0.11 J	ND(0.37)
Phenol		--	ND(0.37)	ND(0.37)	ND(0.38)	ND(0.37)
Pyrene		--	0.20 J	2.1	0.16 J	0.10 J
Furans						
2,3,7,8-TCDF		--	0.000019 Y	0.000017 Y	0.0000083 Y	0.000019 Y
TCDFs (total)		--	0.027 I	0.012 I	0.00026 I	0.0050 I
1,2,3,7,8-PeCDF		--	0.00013	ND(0.000010)	ND(0.0000011)	0.000028
2,3,4,7,8-PeCDF		--	0.000026	ND(0.000011)	0.000011	0.000044
PeCDFs (total)		--	0.060 I	0.024 I	0.00067 I	0.0047 I
1,2,3,4,7,8-HxCDF		--	0.000061	ND(0.000012)	0.000020	0.000033
1,2,3,6,7,8-HxCDF		--	0.000051	0.000017	0.0000050	0.000013
1,2,3,7,8,9-HxCDF		--	ND(0.0000062)	ND(0.0000086)	ND(0.0000075)	ND(0.0000025)
2,3,4,6,7,8-HxCDF		--	0.00016	0.000053	0.0000069	0.000020
HxCDFs (total)		--	0.040 I	0.014 I	0.00046 I	0.0027 I
1,2,3,4,6,7,8-HpCDF		--	0.00050	0.0015 I	0.000062 I	0.000059
1,2,3,4,7,8,9-HpCDF		--	0.000041	0.000022	0.0000017	0.000010
HpCDFs (total)		--	0.0017 I	0.0020 I	0.00010 I	0.00018 I
OCDF		--	0.00012	0.000082	0.000020	0.000056
Dioxins						
2,3,7,8-TCDD		--	ND(0.0000071)	ND(0.0000019)	ND(0.0000035)	ND(0.0000011)
TCDDs (total)		--	ND(0.0000071)	ND(0.0000019)	ND(0.0000035)	ND(0.0000011)
1,2,3,7,8-PeCDD		--	ND(0.000016)	ND(0.000026)	ND(0.0000039)	ND(0.000025)
PeCDDs (total)		--	ND(0.000016)	ND(0.000026)	ND(0.0000039)	ND(0.000025)
1,2,3,4,7,8-HxCDD		--	0.0000086	ND(0.0000094)	ND(0.0000015)	ND(0.0000064)
1,2,3,6,7,8-HxCDD		--	0.000014	ND(0.0000093)	ND(0.0000014)	ND(0.0000065)
1,2,3,7,8,9-HxCDD		--	ND(0.0000038)	ND(0.0000086)	ND(0.0000013)	ND(0.0000059)
HxCDDs (total)		--	0.000027	ND(0.0000094)	ND(0.0000015)	ND(0.0000065)
1,2,3,4,6,7,8-HpCDD		--	0.000067	0.000028	0.000023	0.0000099
HpCDDs (total)		--	0.00017	0.000068	0.000045	0.000022
OCDD		--	0.00034	0.000074	0.00015	0.000062
Total TEQs (WHO TEFs)		--	0.000066	0.000044	0.000013	0.000047
Inorganics						
Antimony		--	1.20 B	ND(6.00)	ND(6.00)	0.990 B
Arsenic	100		15.0	5.80	4.40	6.50
Barium	2,000		18.0 B	18.0 B	32.0	20.0 B
Beryllium	--		0.170 B	0.220 B	0.220 B	0.190 B
Cadmium	20		0.330 B	ND(0.500)	0.0870 B	0.370 B
Chromium	100		5.70	5.10	5.40	9.80
Cobalt	--		6.70	6.30	6.20	17.0
Copper	--		18.0	16.0	19.0	28.0
Cyanide	--		ND(0.560)	0.0350 B	0.0440 B	0.0510 B
Lead	100		22.0	14.0	7.70	45.0
Mercury	4		0.0140 B	0.0270 B	ND(0.110)	0.0140 B
Nickel	--		10.0	10.0	9.50	11.0
Selenium	20		ND(1.00) J	ND(1.00)	ND(1.00)	ND(1.00) J
Silver	100		ND(1.00)	ND(1.00)	ND(1.00)	ND(1.00)
Sulfide	--		8.90	8.90	5.40 B	11.0
Vanadium	--		4.10 B	5.00	5.00	4.10 B
Zinc	--		46.0	34.0	64.0	44.0

**TABLE 2
APPENDIX IX+3 SOIL SAMPLING DATA**

**EAST STREET AREA 2 - NORTH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in dry weight parts per million, ppm)**

1. Samples were collected by ARCADIS and submitted to SGS Environmental Services, Inc. for analysis of Appendix IX+3 constituents.
2. Samples have been validated as per GE's EPA-approved FSP/QAPP, General Electric Company, Pittsfield, Massachusetts.
3. ND - Analyte was not detected. The number in parentheses is the associated detection limit.
4. Total 2,3,7,8-TCDD toxicity equivalents (TEQs) were calculated using Toxicity Equivalency Factors (TEFs) derived by the World Health Organization (WHO) and published by Van den Berg et al. in Environmental Health Perspectives 106(2), December 1998.
5. With the exception of dioxin/furans, only those constituents detected in one or more samples are summarized.

Data Qualifiers:

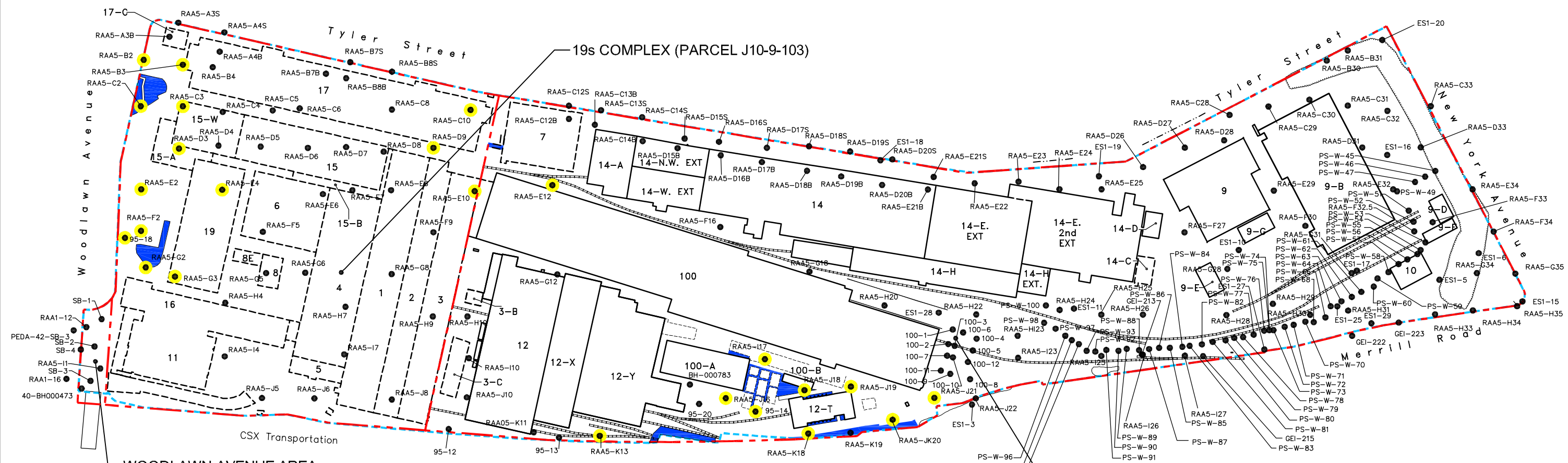
Organics (volatiles, semivolatiles, dioxin/furans)

- J - Indicates that the associated numerical value is an estimated concentration.
- I - Polychlorinated Diphenyl Ether (PCDPE) Interference.
- X - Estimated maximum possible concentration.
- Y - 2,3,7,8-TCDF results have been confirmed on a DB-225 column.

Inorganics

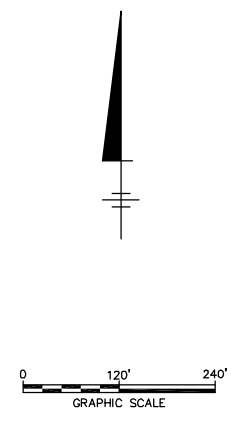
- B - Indicates an estimated value between the instrument detection limit (IDL) and practical quantitation limit (PQL).
- J - Indicates that the associated numerical value is an estimated concentration.

CITY: SYRACUSE DIV/GROUP: ENVCAD DB: L. POSEMAJER L. FORAKER LD: PIC: P. FARR PM: M. HASSETT TM: M. HASSETT LYN: ON: OFF: REF: LYR: ON: OFF: REF: 6/29/2011 2:41 PM BY: FORAKER, LYDIA
 VAE: NV: CAD: SYRACUSE: VACT: CIB: 031124: 0000000001: DWG: SOIL: REMOVE: V31: 24G01: DWG LAYOUT: 1. SAVED: 6/29/2011 2:40 PM ACAD: VER: 18.05 (LMS TECH) PAGES: SETUP: CALD: 2B: PDF PLOT: STYLE: TABLE: PLT: FULL: CTB PLOTTED: 6/29/2011 2:41 PM BY: FORAKER, LYDIA
 XREFS: 31124X02 31124X00



- LEGEND:**
- REMOVAL ACTION AREA BOUNDARY
 - PROPERTY LINE
 - RAA5-K13 EXISTING SOIL SAMPLE LOCATION
 - RAA5-B2 RELEVANT SAMPLE LOCATION
 - ▭ EXISTING BUILDING
 - - - - - FORMER BUILDING LOCATION
 - 14 BUILDING ID
 - APPROXIMATE SURFACE SOIL REMOVAL AREAS

- NOTES:**
1. BASE MAPPING FROM TOPOGRAPHIC SURVEY (DRAWING S2059W01) BY FORESIGHT LAND SURVEYORS DATED 2/9/05. BASE MAPPING WAS REVISED 9/28/10 BASED ON A HILL DRAWING TITLED "OVERALL SITE PLAN", DATED 7/12/2010, AT A SCALE OF 1" = 40'.
 2. NOT ALL PHYSICAL FEATURES SHOWN.



GENERAL ELECTRIC COMPANY
 PITTSFIELD, MASSACHUSETTS
EAST STREET AREA 2-NORTH

**APPROXIMATE SURFACE SOIL REMOVAL
 AND EXISTING SOIL SAMPLE LOCATIONS**

1

